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August 23, 2012

Via ECF Filing and Facsimile (856 757 5355)

Hon. Joel Schneider
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Gloucester, Cumberland, Salem School Districts Joint Insurance Fund, et al. v. Selective Insurance Company of America, et al.*, Civil Action No. 11-CV-6005
Sedgwick File No.: 01560-007742

Dear Judge Schneider:

This firm represents defendant Illinois Union Insurance Company in the above-referenced action.

By this letter, and pursuant to Fed. R. Civ. P. 16(b) and the March 30, 2012 Scheduling Order entered in this action, the parties jointly request an extension of the deadline for pretrial fact discovery from August 31, 2012 to October 31, 2012. This is the first request for an extension by either party.

The parties are in the process of discussing the possibility of settlement and counsel for Plaintiffs recently produced information and documents to counsel for Illinois Union that will facilitate settlement discussions and assist the parties in determining whether a settlement can be reached. The parties expect to know whether settlement is a realistic possibility within the next two weeks.

The parties have diligently responded to each other's discovery demands, and the majority of documents responsive to document demands have been produced to date. In the event settlement cannot be reached, the parties request additional time to complete document production, determine whether additional document demands may be required, prepare any necessary discovery motions, and conduct depositions. Taking into consideration a few known calendar conflicts of counsel, the parties anticipate that the foregoing can be completed by October 31, 2012.

Accordingly, the parties request that the deadline for pretrial fact discovery be extended from August 31, 2012 to October 31, 2012. In the event this request is granted, the parties propose amended dates for subsequent deadlines set forth in paragraphs 6 and 7 of the 3/30/12 Scheduling Order as follows:

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Description	Original Date	Proposed Amended Date
Pretrial Fact Discovery Deadline	August 31, 2012	October 31, 2012
Plaintiffs' expert disclosure and reports due by	September 28, 2012	November 30, 2012
Defendant's expert disclosure and reports due by	October 31, 2012	December 31, 2012
Expert witness depositions concluded by	November 30, 2012	January 31, 2013
Dispositive motions filed by	December 17, 2012	February 22, 2013

Thank you for your consideration.

Respectfully submitted,



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